

RESPONSE  
SN 09/488,275  
PAGE - 2 of 23 -

**REMARKS**

In the Office Action, the Examiner noted that claims 1-4, 6-27 and 29-85 are pending in the application and that claims 1-4, 6-27 and 29-85 are rejected. In view of the following discussion, the Applicants submit that none of the claims now pending in the application are unpatentable under the provisions of 35 U.S.C. §103. Thus, the Applicants believe that all of these claims are now in condition for allowance.

**I. REJECTION OF CLAIMS UNDER 35 U.S.C. § 103**

**Claims 1-4, 6, 10, 11, 13, 15, 31-39, 42-43, 45, 47, 71, 73-75, and 77**

The Examiner rejected claims 1-4, 6, 10, 11, 13, 15, 31-39, 42-43, 45, 47, 71, 73-75, and 77 as being obvious and unpatentable over the Ehreth et al. patent (United States patent 6,286,142, issued September 4, 2001, hereinafter Ehreth) in view of the Schultheiss patent (United States patent 6,208,384, issued March 27, 2001, hereinafter Schultheiss). The rejection is respectfully traversed.

Ehreth teaches a system comprising a communication controller, a plurality of televisions, and a plurality of corresponding channel selection and signaling units. The system functions by having the channel selection and signaling unit receiving a channel select command from a remote control that is associated with a particular television. The channel selection and signaling unit then sends a signal at a particular upstream frequency to an upstream signaling receiver within a communication controller. A unique upstream frequency is specifically designated at each "user selectable setting" located within each channel selection and signaling unit. The communication controller receives a video signal from a telecommunications network and modulates the signal to a unique downstream frequency that is associated with the original upstream frequency of the channel selection and signal unit. The communication controller then transmits the video signal over a video signal distribution network to a plurality of channel selection and signaling units at the designated downstream frequency. The particular channel selection and signaling unit that is configured to receive the video signal at the

RESPONSE  
SN 09/488,275  
PAGE - 3 of 23 -

appropriate downstream frequency receives the signal and subsequently transmits a television signal to its corresponding television.

Thus, for every television (or set of televisions at a remote site), a channel selection and signaling unit directly receives a channel select command from the remote control and transmits a signal over the video signal distribution network to the communication controller at a designated upstream frequency. The communication controller responds by modulating the desired video information and transmits it to the appropriate channel selection and signaling unit on a particular downstream frequency. Because each channel selection and signaling unit for each television (or set of televisions at a remote site) has a separate upstream frequency and downstream frequency, independent control for each television set (or remote site) is possible (see Ehreth, Abstract and Figure 1).

Schultheiss discloses a system that provides information to a single television using a corresponding personal computer (PC). More specifically, a unified television/PC remote control transmits commands to the PC via radio frequency (RF) signals. Television commands may be transmitted to the television directly from the remote control using infrared signals or indirectly via the PC using RF or infrared signals.

The Examiner's attention is directed to the fact that Ehreth and Schultheiss (either singly or in any permissible combination) fail to disclose or suggest a receiver in a residential gateway that is capable of directly receiving channel select commands from a plurality of remote control devices associated with a plurality of televisions, as claimed in Applicants' independent claims 1, 31, and 71. Specifically, Applicants' claims 1, 31, and 71, positively recite:

1. In a residential environment capable of having a plurality of televisions locatable in at least two separate locations, a method of decoding and distributing video signals from a residential gateway, the method comprising:

receiving at least one channel select command from at least one remote control device associated with a respective at least one television of said plurality of televisions, wherein the at least one channel select command is received at a receiver within the residential gateway, wherein the residential gateway is a unitary device for directly receiving channel select commands from a plurality of remote control devices respectively associated with said plurality of televisions;

RESPONSE  
SN 09/488,275  
PAGE - 4 of 23 -

receiving a video signal from a telecommunication network in response to the received at least one channel select command;  
constructing, from the video signal, at least one series of video packets corresponding to the at least one channel select command;  
transporting the at least one series of video packets to at least one video decoder;  
decoding the at least one series of video packets to produce at least one television signal, the decoding performed by the at least one video decoder; and  
transmitting the at least one television signal to the at least one television. (Emphasis added)

31. A method for receiving and decoding signals from a telecommunications network at a residential gateway, and transmitting decoded signals from the residential gateway to a plurality of devices including multiple televisions, the method comprising:  
connecting the residential gateway to the telecommunications network and to each of the plurality of devices so that all communications between the devices and the telecommunications network must pass through the residential gateway;  
selecting a television channel to view for at least one of the multiple televisions by programming an associated remote control device to transmit a channel select command, wherein the residential gateway is a unitary device for directly receiving channel select commands from a plurality of remote control devices respectively associated with said multiple televisions;  
transmitting the at least one channel select command to the telecommunications network;  
receiving a video signal from the telecommunications network corresponding to the at least one channel select command;  
converting the video signal into at least one series of video packets;  
decoding the at least one series of video packets into at least one television signal, the decoding performed by at least one of a plurality of video decoders; and  
transmitting the at least one television signal to the at least one television of said multiple televisions. (Emphasis added)

71. A residential gateway for decoding and distributing video signals received from a telecommunications network to at least two televisions, a first television locatable in close proximity to the residential gateway and a second television remotely locatable to the residential gateway, said residential gateway comprising:  
a receiver for directly receiving channel select commands from a first remote control device associated with the first television, wherein the residential gateway is a unitary device for directly receiving channel select commands from a plurality of remote control devices respectively associated with said at least two televisions;  
a remote control module for processing channel select commands from the first television and the second television;  
a network interface module for receiving video signals from a telecommunications network, wherein the received video signals correspond to the channel select commands processed by the remote control module; and  
a video processor for processing the received video signals to produce a first television signal associated with the first television and a second television signal associated with the second television. (Emphasis added)

RESPONSE  
SN 09/488,275  
PAGE - 5 of 23 -

As recited in claims 1, 31, and 71 above, the Applicants' invention teaches a method that describes a residential gateway device that is capable of directly receiving channel select commands from remote control devices associated with the plurality of televisions. After receiving a channel select command from a particular remote control, the residential gateway processes the necessary video signals obtained from a telecommunications network into a television signal. This signal is then subsequently transmitted to a corresponding television unit. A single residential gateway unit is capable of accomplishing this task for a plurality of televisions and corresponding remote controls.

In contrast, the combination of Ehret and Schultheiss does not teach or suggest this novel approach. The Examiner introduced Ehret but conceded that the reference failed to disclose that the channel select commands of the remote control associated with a television are directly received by a receiver within a unitary residential gateway (see Final Office Action, page 4). In an attempt to remedy this deficiency, the Examiner introduced Schultheiss.

However, the alleged combination does not teach a residential gateway that is capable of directly receiving channel select commands as alleged by the Examiner. Rather, the personal computer (the alleged gateway) described in Schultheiss receives signals from an external network and subsequently transmits data as UHF signals to a single television unit (see Schultheiss, column 5, lines 10-12) per the channel select commands of a corresponding remote control. More importantly, Schultheiss does not disclose or even suggest that this personal computer can be configured to receive signals from multiple remote controls and similarly, distribute data to multiple television units associated with the multiple remote controls.

The Applicants submit that there is no suggestion or motivation to combine Schultheiss with Ehret. The Applicants submit that Schultheiss teaches away from Ehret since Schultheiss does not mention or suggest the operation of a plurality of televisions. Specifically, the specification and claims of Schultheiss only teach and suggest the operation of a single personal computer with a single television set. The Examiner alleged that Schultheiss discloses, as an object of the invention, the provision

RESPONSE  
SN 09/488,275  
PAGE - 6 of 23 -

of additional services, without requiring costly add-on accessory units and without requiring memory and computing power (see Schultheiss, column 1, lines 46-53). The Applicants submit that this referenced section of Schultheiss pertains to additional television services (such as an online television program guide) and additional accessory units, including cable television descramblers, video game players, online television program guide receivers, and satellite television receivers. Accordingly, the Applicants respectfully submit that the "additional services" without requiring costly "accessory units" does not refer or suggest the use of a second television, but rather to services and accessories intended for a single television.

Even if these references could somehow be operably combined (and the Applicants submit that they cannot be operably combined), the combination would still provide a gateway that could not directly receive a plurality of channel select commands from remote control devices associated with the plurality of televisions. The PC as disclosed in Schultheiss can only receive channel select commands from a single remote control and can only transmit television signals to a single television unit. Although the PC in Schultheiss can directly receive channel select commands from a single remote control, it would not be able to transmit a television signal to a plurality of televisions in a manner described by Ehret. More specifically, the PC itself (as disclosed in Schultheiss) is required to transmit the television signal to the television unit. Thus, the PC cannot even function as the channel selection and signaling unit 50, which can provide the television signal to a plurality of televisions, described by Ehret. Thus, the combination proposed by the Examiner is entirely inconsistent with the Applicants' invention as set forth in claims 1, 31, and 71.

Therefore, the Applicants submit that the combination of Ehret and Schultheiss does not teach all of the elements as set forth in claims 1, 31, and 71 of the present invention. Consequently, the Applicants respectfully submit that the present invention as set forth in claims 1, 31, and 71 are not made obvious by the teaching of Ehret in view of Schultheiss fully satisfy the requirements of 35 U.S.C. §103.

RESPONSE  
SN 09/488,275  
PAGE - 7 of 23 -

Dependent claims 2-4, 6, 10-11, 13, 15, 32-39, 42-43, 45, 47, 73-75 and 77 depend, either directly or indirectly, from claims 1, 31, and 71 and recite additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claims 2-4, 6, 10-11, 13, 15, 32-39, 42-43, 45, 47, 73-75 and 77 are also not made obvious by the teaching of Ehreth in view of Schultheiss. Therefore, the Applicants submit that these dependent claims also fully satisfy the requirements of 35 U.S.C. §103 and are patentable thereunder.

Claims 7, 8, 40, 41, 67, 69, and 72

The Examiner rejected claims 7, 8, 40, 41, 67, 69, and 72 as being unpatentable over Ehreth in view of Schultheiss in further view of Hamlin (United States patent 5,574,964, issued November 12, 1996, hereinafter Hamlin). The rejection is respectfully traversed.

Ehreth and Schultheiss have been discussed above. The Examiner conceded that the combination of Ehreth and Schultheiss fails to disclose a wireless receiver in the residential gateway receiving infrared signals from a remote control. Consequently, the Examiner introduced Hamlin in order to remedy this deficiency.

Specifically, Hamlin discloses a signal distribution system having a converter with input terminals for receiving signals of varying configurations and an output terminal for transmitting converted signals. The input signals received by the converter are each converted into a converted signal frequency component of a common bus signal, which is then transmitted by the converter. The converter output terminal transmits the common bus signal on a communication bus. The communication bus is coupled to at least one interface pod for receiving the common bus signal and re-transmitting a desired converted signal (see Hamlin, Abstract).

The Examiner's attention is directed to the fact that Ehreth, Schultheiss, and Hamlin (either singly or in any permissible combination) fail to disclose or suggest a single residential gateway that is capable of directly receiving channel select commands from remote control devices associated with a plurality of televisions, as claimed in

RESPONSE  
SN 09/488,275  
PAGE - 8 of 23 -

Applicants' independent claims 1, 31, 67 and 71. Claims 1, 31, and 71 are presented above. The Applicants' claim 67, positively recites:

67. In a residential environment having at least two televisions, a first television locatable in close proximity to a residential gateway and a second television remotely locatable from the residential gateway, a method of distributing video signals to the televisions from the residential gateway, the method comprising:  
receiving channel select commands including a first channel select command received directly from an optical remote control device associated with the first television at an optical receiver within the residential gateway, and a second channel select command from a second remote control device associated with the second television, wherein the first channel select command is received directly from the remote control to the residential gateway and the second channel select command is received from the second remote control device by the gateway over media without being passed through an active electronic device;  
receiving, at a network interface module within the residential gateway, a video signal from a telecommunications network, wherein said residential gateway is a unitary device for directly receiving channel select commands from a plurality of remote control devices respectively associated with said at least two televisions;  
transporting the received video signal to a video processor located within the residential gateway;  
processing the transported video signal to produce a first television signal corresponding to the first channel select command and a second television signal corresponding to the second channel select command; and  
transmitting the first television signal to the first television and the second television signal to the second television. (Emphasis added)

Therefore, the Applicants submit that the combination of Ehret, Schultheiss and Hamlin does not teach all of the elements as set forth in claims 1, 31, 67 and 71 of the present invention. Notably, Hamlin does not bridge the substantial gap of a residential gateway is capable of directly receiving channel select commands from a plurality of remote control devices associated with a respective plurality of televisions that exists between the present invention and the combination of Ehret and Schultheiss. Thus, the Applicants respectfully submit that the present invention as set forth in claims 1, 31, 67 and 71 are not made obvious by the teaching of Ehret in view of Schultheiss in further view of Hamlin and fully satisfy the requirements of 35 U.S.C. §103.

Dependent claims 7, 8, 40, 41, 69, and 72 depend, either directly or indirectly, from claims 1, 31, 67 and 71 and recite additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claims 7, 8, 40, 41, 69, and 72 are also not made obvious by the teaching of Ehret in view of Schultheiss in

RESPONSE  
SN 09/488,275  
PAGE - 9 of 23 -

further view of Hamlin. Therefore, the Applicants submit that these dependent claims also fully satisfy the requirements of 35 U.S.C. §103 and are patentable thereunder.

Claim 9

The Examiner rejected claim 9 as being unpatentable over Ehret in view of Schultheiss in further view of Martin (United States patent 5,500,691, issued March 19, 1996, hereinafter Martin). The rejection is respectfully traversed.

Ehret and Schultheiss have been discussed above. The Examiner conceded that the combination of Ehret and Schultheiss fails to disclose two different types of receivers within the residential gateway. Consequently, the Examiner introduced Martin in order to remedy this deficiency.

Martin teaches a video system that includes a receiver that generates a remote identifier setup display on a television monitor and further includes a remote control unit having a radio frequency transmitter and an infrared transmitter. The video system enables a user to enter a remote control identifier for the radio frequency transmitter through the remote identifier setup display using the infrared transmitter. The receiver initially ignores remote command signals received from the radio frequency transmitter until the remote control identifier is entered (see Martin, Abstract).

However, Martin fails to bridge the substantial gap existing between the combination of Ehret and Schultheiss and the present invention. Specifically, Martin fails to disclose or suggest the novel concept of a residential gateway that is capable of directly receiving channel select commands from remote control devices associated with a plurality of televisions. Therefore, the Applicants respectfully submit that the present invention as set forth in claim 1 is not made obvious by the teaching of Ehret in view of Schultheiss in further view of Martin and fully satisfies the requirements of 35 U.S.C. §103.

Dependent claim 9 depends directly from claim 1 and recites additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claim 9 is also not made obvious by the teaching of Ehret in view of Schultheiss in

RESPONSE  
SN 09/488,275  
PAGE - 10 of 23 -

further view of Martin. Therefore, the Applicants submit that dependent claim 9 also fully satisfies the requirements of 35 U.S.C. §103 and is patentable thereunder.

Claims 12, 44, 68, and 78

The Examiner rejected claims 12, 44, 68, and 78 as being unpatentable over Ehreth in view of Schultheiss in further view of White (United States patent 5,596,373, issued January 21, 1997, hereinafter White). The rejection is respectfully traversed.

Ehreth and Schultheiss have been discussed above. The Examiner conceded that the combination of Ehreth and Schultheiss fails to disclose S-video. Consequently, the Examiner introduced White in order to remedy this deficiency.

Specifically, White discloses an innovative but easy to use on-line program list that is provided to give the user of a multiple channel television broadcast system a wealth of programming information in a simple format that is easy to understand. The guide enables the user to easily select a particular program to watch or to watch in the future. Unlike prior art television guides, the present invention presents a program list that is oriented according to the program instead of the channel. In particular, the program list provides program information and the times the program is broadcasted the displayed timeframe. This is particularly useful for viewing in one simple and easy-to-read format the start times of a pay-per-view program, which may, for example, be broadcasted every 1/2 hour over a variety of channels (see White, Abstract).

However, White fails to bridge the substantial gap existing between the combination of Ehreth and Schultheiss and the present invention. Specifically, White fails to disclose or suggest the novel concept of a residential gateway that is capable of directly receiving channel select commands from remote control devices associated with a plurality of televisions. Therefore, the Applicants respectfully submit that the present invention as set forth in claims 1, 31, 67, and 71 are not made obvious by the teaching of Ehreth in view of Schultheiss in further view of White and fully satisfy the requirements of 35 U.S.C. §103.

Dependent claims 12, 44, 68, and 78 depend, either directly or indirectly, from claims 1, 31, 67, and 71 and recite additional features thereof. As such and for the

RESPONSE  
SN 09/488,275  
PAGE - 11 of 23 -

exact same reasons set forth above, the Applicants submit that claims 12, 44, 68, and 78 are also not made obvious by the teaching of Ehreth in view of Schultheiss in further view of White. Therefore, the Applicants submit that these dependent claims also fully satisfy the requirements of 35 U.S.C. §103 and are patentable thereunder.

**Claims 14 and 46**

The Examiner rejected claims 14 and 46 as being unpatentable over Ehreth in view of Schultheiss in further view of Bindlish (United States patent 5,608,864, issued March 4, 1997, hereinafter Bindlish). The rejection is respectfully traversed.

Ehreth and Schultheiss have been discussed above. The Examiner conceded that the combination of Ehreth and Schultheiss fails to disclose decoding with three separate channels. Consequently, the Examiner introduced Bindlish in order to remedy this deficiency.

Specifically, Bindlish discloses a computer video controller with two video data pipelines for simultaneously displaying full motion video within a window in a video display. A first data pipeline displays background video at a first pixel depth. A second data pipeline is provided to display a motion video window at a second, usually higher, pixel depth. The location of the motion video window is measured horizontally in number of memory fetch cycles needed to retrieve the horizontal scan line of pixel data abutting the motion video window. The width of the motion video window is measured in the number of memory fetches required to retrieve one scan line of the motion video window. By providing two parallel data pipelines having equal delays, the motion video window can be generated by selectively retrieving background pixel data or motion video window pixel data and transferring the data to the appropriate pipeline. In an alternative embodiment, data tags may be used to distinguish between background and motion video window pixel data. The controller may also support various compression formats for motion video (see Bindlish, Abstract).

However, Bindlish fails to bridge the substantial gap existing between the combination of Ehreth and Schultheiss and the present invention. Specifically, Bindlish fails to disclose or suggest the novel concept of a residential gateway that is capable of

RESPONSE  
SN 09/488,275  
PAGE - 12 of 23 -

directly receiving channel select commands from remote control devices associated with a plurality of televisions. Therefore, the Applicants respectfully submit that the present invention as set forth in claims 1 and 31 are not made obvious by the teaching of Ehret in view of Schultheiss in further view of Bindlish and fully satisfy the requirements of 35 U.S.C. §103.

Dependent claims 14 and 46 depend, either directly or indirectly, from claims 1 and 31 and recite additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claims 14 and 46 are also not made obvious by the teaching of Ehret in view of Schultheiss in further view of Bindlish. Therefore, the Applicants submit that these dependent claims also fully satisfy the requirements of 35 U.S.C. §103 and are patentable thereunder.

Claims 16-23, 25-26, 30, 48, 50-52, 57-58, 60, and 62-66

The Examiner rejected claims 16-23, 25-26, 30, 48, 50-52, 57-58, 60, and 62-66 as being unpatentable over Ehret in view of Schultheiss in further view of Nguyen (United States patent 5,515,511, issued March 4, 1997, hereinafter Nguyen). The rejection is respectfully traversed.

Ehret and Schultheiss have been discussed above. The Examiner conceded that the combination of Ehret and Schultheiss fails to disclose a plurality of processors. Consequently, the Examiner introduced Nguyen in order to remedy this deficiency.

Specifically, Nguyen discloses a multimedia distribution network that combines the flexibility of digital video and digital networks with the low cost, high bandwidth, and isochronous capabilities of analog video distribution. At the heart of the network is a hybrid digital/analog multimedia hub, called a C-box, which provides connectivity to digital networks, both local area and wide area, with the necessary video compression and decompression, composition engines for multiple video streams and analog/digital conversions of the multiple video streams for connectivity to an analog video distribution network for delivery to end user workstations. The C-box receives multiple compressed digital video streams, decompresses the video streams, converts the decompressed video streams to analog, and delivers the converted analog signals to workstations via an analog cable television (CATV) network. The amount of video processing (e.g.,

RESPONSE  
SN 09/488,275  
PAGE - 13 of 23 -

compression and decompression) power required is proportional to the number of active video streams instead of the number of attached end user workstations. The analog channels over which the converted analog signals are transmitted are dynamically allocated, and once the analog signals have been transmitted to a requesting client terminal, the channels are released for reuse (see Nguyen, Abstract).

The Examiner's attention is directed to the fact that Ehret, Schultheiss, and Nguyen (either singly or in any permissible combination) fail to disclose or suggest a residential gateway that is a unitary device for, among other things, directly receiving channel select commands from remote control devices associated with a plurality of televisions, as claimed in Applicants' independent claims 16 and 48. Specifically, Applicants' claims 16 and 48, positively recite:

16. A residential gateway for distributing video signals to a plurality of televisions locatable within at least two separate locations in a residential environment, said residential gateway comprising:

a receiver for directly receiving channel select commands from remote control devices associated with the plurality of televisions, wherein the residential gateway is a unitary device for directly receiving channel select commands from a plurality of remote control devices respectively associated with said plurality of televisions;

a network interface module for receiving signals, including video signals, from a telecommunications network, wherein the received video signals correspond to the channel select commands;

a plurality of video processors for decoding the received video signal to produce at least one television signal; and

a device for transmitting the at least one television signal to a television of said plurality of televisions located in close proximity to the residential gateway and connected directly to the gateway. (Emphasis added)

48. A residential gateway for receiving and decoding signals from a telecommunications network and transmitting decoded signals to a plurality of devices including multiple televisions, the residential gateway comprising:

connectors for connecting the plurality of devices to the residential gateway;

a receiver for directly receiving channel select commands from remote control devices associated with the multiple televisions wherein the residential gateway is a unitary device;

a network interface module for transmitting signals, including said channel select commands, to the telecommunications network and receiving signals, including video signals, from the telecommunications network;

means for converting the video signals into a series of video packets;

video decoders for decoding the series of video packets into television signals corresponding to the channel select commands, and transmitting the television signals to the corresponding multiple televisions. (Emphasis added)

RESPONSE  
SN 09/488,275  
PAGE - 14 of 23 -

Similar to independent claims 1, 31, 67 and 71, claims 16 and 48 also disclose a residential gateway that is capable of directly receiving channel select commands from remote control devices associated with a plurality of televisions. As presented above, the combination of Ehreth and Schultheiss does not teach or suggest this limitation as set forth in claims 16 and 48. Moreover, Nguyen fails to bridge this substantial gap existing between the combination of Ehreth and Schultheiss and the present invention. Therefore, the Applicants respectfully submit that the present invention as set forth in claims 16 and 48 are not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Nguyen and fully satisfy the requirements of 35 U.S.C. §103.

Dependent claims 17-23, 25-26, 30, 50-52, 57-58, 60, and 62-66 depend, either directly or indirectly, from claims 16 and 48 and recite additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claims 17-23, 25-26, 30, 50-52, 57-58, 60, and 62-66 are also not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Nguyen. Therefore, the Applicants submit that these dependent claims also fully satisfy the requirements of 35 U.S.C. §103 and are patentable thereunder.

#### Claims 24 and 56

The Examiner rejected claims 24 and 56 as being unpatentable over Ehreth in view of Schultheiss in further view of Nguyen in further view of Martin. The rejection is respectfully traversed.

Ehreth, Schultheiss, Nguyen, and Martin have all been discussed above.

The Examiner's attention is directed to fact that Martin fails to bridge the substantial gap existing between the combination of Ehreth, Schultheiss, and Nguyen and the present invention. Specifically, Martin fails to disclose or suggest the novel concept of a residential gateway that is a unitary device for, among other things, directly receiving channel select commands from remote control devices associated with a plurality of televisions. Therefore, the Applicants respectfully submit that the present invention as set forth in claims 16 and 48 are not made obvious by the teaching of

RESPONSE  
SN 09/488,275  
PAGE - 15 of 23 -

Ehreth in view of Schultheiss in further view of Nguyen in further view of Martin and fully satisfy the requirements of 35 U.S.C. §103.

Dependent claims 24 and 56 depend, either directly or indirectly, from claims 16 and 48 and recite additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claims 24 and 56 are also not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Nguyen in further view of Martin. Therefore, the Applicants submit that these dependent claims also fully satisfy the requirements of 35 U.S.C. §103 and are patentable thereunder.

#### Claim 27

The Examiner rejected claim 27 as being unpatentable over Ehreth in view of Schultheiss in further view of Nguyen in further view of White. The rejection is respectfully traversed.

Ehreth, Schultheiss, Nguyen, and White have all been discussed above.

The Examiner's attention is directed to fact that White fails to bridge the substantial gap existing between the combination of Ehreth, Schultheiss, and Nguyen and the present invention. Specifically, White fails to disclose or suggest the novel concept of a residential gateway that is capable of directly receiving channel select commands from remote control devices associated with a plurality of televisions. Therefore, the Applicants respectfully submit that the present invention as set forth in claim 16 is not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Nguyen in further view of White and fully satisfies the requirements of 35 U.S.C. §103.

Dependent claim 27 depends indirectly from claim 16 and recites additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claim 27 is also not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Nguyen in further view of White. Therefore, the Applicants submit that dependent claim 27 also fully satisfies the requirements of 35 U.S.C. §103 and is patentable thereunder.

#### Claims 29 and 61

RESPONSE  
SN 09/488,275  
PAGE - 16 of 23 -

The Examiner rejected claims 29 and 61 as being unpatentable over Ehreth in view of Schultheiss in further view of Nguyen in further view of Bindlish. The rejection is respectfully traversed.

Ehreth, Schultheiss, Nguyen, and Bindlish have all been discussed above.

The Examiner's attention is directed to fact that Bindlish fails to bridge the substantial gap existing between the combination of Ehreth, Schultheiss, and Nguyen and the present invention. Specifically, Bindlish fails to disclose or suggest the novel concept of a residential gateway that is capable of directly receiving channel select commands from remote control devices associated with a plurality of televisions. Therefore, the Applicants respectfully submit that the present invention as set forth in claims 16 and 48 are not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Nguyen in further view of Bindlish and fully satisfy the requirements of 35 U.S.C. §103.

Dependent claims 29 and 61 depend, either directly or indirectly, from claims 16 and 48 and recite additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claims 29 and 61 are also not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Nguyen in further view of Bindlish. Therefore, the Applicants submit that these dependent claims also fully satisfy the requirements of 35 U.S.C. §103 and are patentable thereunder.

#### Claim 49

The Examiner rejected claim 49 as being unpatentable over Ehreth in view of Schultheiss in further view of White. The rejection is respectfully traversed.

Ehreth, Schultheiss, and White have all been discussed above.

The Examiner's attention is directed to fact that White fails to bridge the substantial gap existing between the combination of Ehreth and Schultheiss and the present invention. Specifically, White fails to disclose or suggest the novel concept of a residential gateway that is capable of directly receiving channel select commands from remote control devices associated with a plurality of televisions. Therefore, the Applicants respectfully submit that the present invention as set forth in claim 48 is not

RESPONSE  
SN 09/488,275  
PAGE - 17 of 23 -

made obvious by the teaching of Ehreth in view of Schultheiss in further view of White and fully satisfies the requirements of 35 U.S.C. §103.

Dependent claim 49 depends directly from claim 48 and recites additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claim 49 is also not made obvious by the teaching of Ehreth in view of Schultheiss in further view of White. Therefore, the Applicants submit that dependent claim 49 also fully satisfies the requirements of 35 U.S.C. §103 and is patentable thereunder.

#### Claims 53-55

The Examiner rejected claims 53-55 as being unpatentable over Ehreth in view of Schultheiss in further view of Nguyen in further view of Hamlin. The rejection is respectfully traversed.

Ehreth, Schultheiss, Nyguen, and Hamlin have all been discussed above.

The Examiner's attention is directed to the fact that Ehreth, Schultheiss, Nguyen and Hamlin (either singly or in any permissible combination) fail to disclose or suggest a residential gateway that is capable of directly receiving channel select commands from remote control devices associated with a plurality of televisions, as claimed in Applicants' independent claim 48. Therefore, the Applicants submit that the combination of Ehreth, Schultheiss, Nguyen, and Hamlin does not teach all of the elements as set forth in claim 48 of the present invention. Consequently, the Applicants respectfully submit that the present invention as set forth in claim 48 are not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Nguyen in further view of Hamlin and fully satisfy the requirements of 35 U.S.C. §103.

Dependent claims 53-55 depend, either directly or indirectly, from claim 48 and recite additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claims 53-55 are also not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Nguyen in further view of Hamlin. Therefore, the Applicants submit that these dependent claims also fully satisfy the requirements of 35 U.S.C. §103 and are patentable thereunder.

RESPONSE  
SN 09/488,275  
PAGE - 18 of 23 -

**Claim 59**

The Examiner rejected claim 59 as being unpatentable over Ehreth in view of Hamlin in further view of Nguyen in further view of White. The rejection is respectfully traversed.

Ehreth, Hamlin, Nguyen, and White have all been discussed above.

The Examiner's attention is directed to fact that the combination of Ehreth, Hamlin, Nguyen, and White does not teach the present invention as set forth in claim 48. Specifically, the combination fails to disclose or suggest the novel concept of a residential gateway that is capable of directly receiving channel select commands from remote control devices associated with a plurality of televisions. Therefore, the Applicants respectfully submit that the present invention as set forth in claim 48 is not made obvious by the teaching of Ehreth in view of Hamlin in further view of Nguyen in further view of White and fully satisfies the requirements of 35 U.S.C. §103.

Dependent claim 59 depends indirectly from claim 48 and recites additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claim 59 is also not made obvious by the teaching of Ehreth in view of Hamlin in further view of Nguyen in further view of White. Therefore, the Applicants submit that dependent claim 59 also fully satisfies the requirements of 35 U.S.C. §103 and is patentable thereunder.

**Claim 70**

The Examiner rejected claim 70 as being unpatentable over Ehreth in view of Schultheiss in further view of Nguyen in further view of White. The rejection is respectfully traversed.

Ehreth, Schultheiss, Nguyen, and White have all been discussed above.

The Examiner's attention is directed to fact that White fails to bridge the substantial gap existing between the combination of Ehreth, Schultheiss, and Nguyen and the present invention. Specifically, White fails to disclose or suggest the novel concept of a residential gateway is capable of directly receiving channel select commands from remote control devices associated with a plurality of televisions.

RESPONSE  
SN 09/488,275  
PAGE - 19 of 23 -

Therefore, the Applicants respectfully submit that the present invention as set forth in claim 67 is not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Nguyen in further view of White and fully satisfies the requirements of 35 U.S.C. §103.

Dependent claim 70 depends directly from claim 67 and recites additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claim 70 is also not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Nguyen in further view of White. Therefore, the Applicants submit that dependent claim 70 also fully satisfies the requirements of 35 U.S.C. §103 and is patentable thereunder.

#### Claim 76

The Examiner rejected claim 76 as being unpatentable over Ehreth in view of Schultheiss in further view of Decker (United States patent 6,167,443, issued January 21, 1997, hereinafter Decker). The rejection is respectfully traversed.

Ehreth and Schultheiss have been discussed above.

Decker discloses a remote video delivery system that transmits video and text from a hotel office to hotel rooms. A series of video players generates the video signals to modulators. The modulators transmit the signals on various frequencies. A system controller directs the signals from the modulators to the appropriate converter boxes within the rooms. An outside vendor runs a billing system to charge the guests for the video delivery without the need for involvement by the hotel staff (see Decker, Abstract).

The Examiner's attention is directed to fact that Decker fails to bridge the substantial gap existing between the combination of Ehreth and Schultheiss and the present invention. Specifically, Decker fails to disclose or suggest the novel concept of a residential gateway that is capable of directly receiving channel select commands from remote control devices associated with a plurality of televisions. Therefore, the Applicants respectfully submit that the present invention as set forth in claim 71 is not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Decker and fully satisfies the requirements of 35 U.S.C. §103.

RESPONSE  
SN 09/488,275  
PAGE - 20 of 23 -

Dependent claim 76 depends indirectly from claim 71 and recites additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claim 76 is also not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Decker. Therefore, the Applicants submit that dependent claim 76 also fully satisfies the requirements of 35 U.S.C. §103 and is patentable thereunder.

Claims 79-82 and 85

The Examiner rejected claims 79-82 and 85 as being unpatentable over Ehreth in view of Schultheiss in further view of Hamlin in further view of White. The rejection is respectfully traversed.

Ehreth, Schultheiss, Hamlin, and White have all been discussed above.

The Examiner's attention is directed to the fact that Ehreth, Schultheiss, Hamlin and White (either singly or in any permissible combination) fail to disclose or suggest a residential gateway that is a unitary device for, among other things, directly receiving channel select commands from remote control devices associated with a plurality of televisions, as claimed in Applicants' independent claim 79. Independent claim 79 possesses similar limitations to independent claim 1, 16, 31, 48, 67 and 71.

Specifically, Applicants' claim 79, positively recites:

79. A residential gateway for decoding and distributing signals from a telecommunications network to a plurality of devices including multiple televisions, the residential gateway comprising:

a network interface module for communicating with the telecommunications network, wherein the network interface module receives signals, including video signals, from the telecommunications network and transmits signals, including channel select commands, to the telecommunications network, wherein said residential gateway is a unitary device for directly receiving channel select commands from a plurality of remote control devices associated with a respective plurality of televisions;

a main MPEG processor for decoding video signals associated with a first television into a first television signal, wherein the first television is located in close proximity to the residential gateway, the first television signal has an S-video format and is available to the first television via an S-video port, and the first television set has an optical remote control device used for selecting channels to view on the first television set;

an optical receiver for directly receiving the channel select commands from the optical remote control device associated with the first television, wherein the receiver receives channel select commands as wireless signals; and

RESPONSE  
SN 09/488,275  
PAGE - 21 of 23 -

a device for transferring signals between said network interface module and said main MPEG processor. (Emphasis added)

Similar to independent claims 1, 16, 31, 48, 67 and 71, claim 79 also discloses a residential gateway that is capable of directly receiving channel select commands from remote control devices associated with a plurality of televisions. As presented above, the combination of Ehret, Schultheiss, and Hamlin does not teach or suggest this limitation as set forth in claim 79. Moreover, White fails to bridge this substantial gap existing between the combination of Ehret, Schultheiss, and Hamlin and the present invention. Therefore, the Applicants respectfully submit that the present invention as set forth in claim 79 is not made obvious by the teaching of Ehret in view of Schultheiss in further view of Hamlin in further view of White and fully satisfies the requirements of 35 U.S.C. §103.

Dependent claims 80-82 and 85 depend, either directly or indirectly, from claim 79 and recite additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claims 80-82 and 85 are also not made obvious by the teaching of Ehret in view of Schultheiss in further view of Hamlin in further view of White. Therefore, the Applicants submit that these dependent claims also fully satisfy the requirements of 35 U.S.C. §103 and are patentable thereunder.

### Claim 83

The Examiner rejected claim 83 as being unpatentable over Ehret in view of Schultheiss in further view of Hamlin in further view of White in further view of Decker. The rejection is respectfully traversed.

Ehret, Schultheiss, Hamlin, White, and Decker have all been discussed above.

The Examiner's attention is directed to fact that Decker fails to bridge the substantial gap existing between the combination of Ehret, Schultheiss, Hamlin, and White and the present invention. Specifically, Decker fails to disclose or suggest the novel concept of a residential gateway that is capable of directly receiving channel select commands from remote control devices associated with a plurality of televisions. Therefore, the Applicants respectfully submit that the present invention as set forth in

RESPONSE  
SN 09/488,275  
PAGE - 22 of 23 -

claim 79 is not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Hamlin in further view of White in further view of Decker and fully satisfies the requirements of 35 U.S.C. §103.

Dependent claim 83 depends indirectly from claim 79 and recites additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claim 83 is also not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Hamlin in further view of White in further view of Decker. Therefore, the Applicants submit that dependent claim 83 also fully satisfies the requirements of 35 U.S.C. §103 and is patentable thereunder.

**Claim 84**

The Examiner rejected claim 84 as being unpatentable over Ehreth in view of Schultheiss in further view of Hamlin in further view of White in further view of Nguyen. The rejection is respectfully traversed.

Ehreth, Schultheiss, Hamlin, White, and Nguyen have all been discussed above.

The Examiner's attention is directed to fact that Nguyen fails to bridge the substantial gap existing between the combination of Ehreth, Schultheiss, Hamlin, and White and the present invention. Specifically, Nguyen fails to disclose or suggest the novel concept of a residential gateway that is capable of directly receiving channel select commands from remote control devices associated with a plurality of televisions. Therefore, the Applicants respectfully submit that the present invention as set forth in claim 79 is not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Hamlin in further view of White in further view of Nguyen and fully satisfies the requirements of 35 U.S.C. §103.

Dependent claim 84 depends directly from claim 79 and recites additional features thereof. As such and for the exact same reasons set forth above, the Applicants submit that claim 84 is also not made obvious by the teaching of Ehreth in view of Schultheiss in further view of Hamlin in further view of White in further view of Nguyen. Therefore, the Applicants submit that dependent claim 84 also fully satisfies the requirements of 35 U.S.C. §103 and is patentable thereunder.

RESPONSE  
SN 09/488,275  
PAGE - 23 of 23 -

## II. CONCLUSION

The Applicants respectfully submit that none of the claims presently in the application are unpatentable under the provisions of 35 U.S.C. §103. Consequently, the Applicants believe that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

If, however, the Examiner believes that there are any unresolved issues requiring adverse final action in any of the claims now pending in the application, it is requested that the Examiner telephone Mr. Kin-Wah Tong at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

Date

6/7/05

  
\_\_\_\_\_  
Kin-Wah Tong, Attorney  
Reg. No. 39,400  
(732) 530-9404

Moser, Patterson & Sheridan, LLP  
Attorneys at Law  
595 Shrewsbury Avenue  
Suite 100  
Shrewsbury, NJ 07702